



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ANDREW BARRON WORDEN and BARRON  
PARTNERS LP,

Plaintiffs,

-against-

RICHARD N. BELL , COHEN & MALAD LLP,  
And DOES 1-5

Defendants.

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CIVIL ACTION NUMBER:  
08 CV 01812 (JES)

**PROPOSED ORDER FOR  
PRE-MOTION CONFERENCE  
AND ENLARGEMENT OF TIME**

WHEREAS, Defendants Richard N. Bell and Cohen & Malad LLP have requested that this Court schedule, at its convenience, a pre-motion conference in connection with Defendants' motion to dismiss to the plaintiffs' complaint, pursuant to Fed. R. Civ. P. 12(b)(2)(4) and (6) or, alternatively to transfer or stay the action and such pre-motion conference is required by the Individual Rules of this Court before any motion may be filed with the Court; and

WHEREAS, Defendants, Richard N. Bell and Cohen & Malad LLP have, for good cause shown, made an application to enlarge their time to respond to the Complaint pursuant to Fed. R. Civ. P. 6(b) until such time as may be directed or agreed to at a pre-motion conference so that the pre-motion conference may be conducted as required by the Individual Rules of this Court; and

WHEREAS, this Court's Individual Rules do not permit the Defendants, Richard N. Bell and Cohen & Malad LLP to serve the motion to dismiss until after the pre-motion is conducted and the motion to dismiss is necessary to address the certain jurisdictional and legal defenses to the plaintiffs' claims;

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IT IS ON this 27 day of March, 2008, hereby:

ORDERED THAT the parties, by their counsel, shall appear before the Court in  
Courtroom 21C on the 8<sup>th</sup> day of April, 2008 at 3:00 PM for purposes of a pre-motion  
conference ; and

ORDERED THAT Defendants' time to respond to the complaint is hereby enlarged until  
such time as may be set at the pre-motion conference.

  
Hon. John E. Sprizzo, U.S.D.J.